

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF IOWA**

IN RE: BDC GROUP, INC., Debtor.	Case No. 23-00484 MOTION TO VACATE
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COMES NOW Creditor Keystone Savings Bank (the “Bank”), and respectfully moves the Court to enter an Order vacating the order entered at Dkt. 513, which granted the Bank and Trustee’s joint motion to approve settlement and for derivative standing, Dkt. 501. The docketing of the joint motion included a bar date served via CM/ECF, but was not served via the bankruptcy noticing center. Because of this issue the Bank requests that the Court vacate its prior order so that notice pursuant to Rule 2002(a)(1) can be given. Upon expiration of the new notice period, and assuming no objections are made, the Bank will submit a proposed order.

WHEREFORE, the movant respectfully request that this Court vacate the order at Dkt. 513 and for such other relief as may be just and proper under the circumstances.

Dated: August 5, 2024

Respectfully Submitted,

SIMMONS PERRINE MOYER BERGMAN PLC

/s/ Abram V. Carls

Eric W. Lam, AT0004416

Abram V. Carls, AT0011818

115 Third Street SE, Suite 1200

Cedar Rapids, IA 52401

Phone: 319-366-7641

Facsimile: 319-366-1917

elam@simmonsperrine.com

acarls@spmbllaw.com

ATTORNEYS FOR KEYSTONE SAVINGS BANK

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on August 5, 2024, a copy of the foregoing document was filed with the Clerk of Court for the United States Bankruptcy Court for the Northern District of Iowa using the CM/ECF system, and served electronically on those participants that receive service through the CM/ECF System.

/s/ Abram V. Carls